



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE

Indiana Dunes National Lakeshore
1100 N. Mineral Springs Road
Porter, Indiana 46304-1299

OFFICIAL COMMENT

November 13, 2008

N3617(INDU)

#08-764 (Antidegradation)

Ms. MaryAnn Stevens

Mail Code 65-40

Rules Section

Office of Water Quality

Indiana Department of Environmental Management

100 North Senate Ave.

Indianapolis, Indiana 46204-2251

Dear Ms. Stevens:

This letter is concerning the Draft Indiana Antidegradation Rules posted for public review beginning on November 7, 2008. Indiana Dunes National Lakeshore understands that the result of this rule may allow industry to increase the level of pollutants discharged into Lake Michigan.

We strongly support IDEM's efforts to comply with the federal Clean Water Act requirements by updating Indiana's water quality standards at least every three years, and developing an antidegradation rule for all surface waters of the state including Lake Michigan and its tributaries. We believe that any new state regulations should result in strong protection for all of Indiana's valuable water resources from any new or increased pollution above the current background levels. Concerning the Proposed Rules, we offer the following comments:

- (1) Require any new or increased discharges into Indiana's surface waters that flow into Lake Michigan to go through complete antidegradation review and justification process.
- (2) No degradation should be allowed that increases the background pollutant levels in Lake Michigan. If degradation that increases background pollutant levels is allowed for any reason then mitigation must be required.
- (3) Few if any exemptions should be included in the rule that enables industry to avoid providing required justification for any new or increased discharges, even including minor increases.

We look forward to reviewing additional draft rules concerning antidegradation standards and implementation procedures, which will reduce pollution to Lake Michigan and be enforced by the state. If you have any questions concerning this response please contact Assistant Chief for Natural Resource Management Brenda Waters at 219-395-1552.

Sincerely,

for 
Constantine J. Dillon
Superintendent

cc:

Jay Glase, Great Lakes Area Fishery Biologist, National Park Service,
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